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8 UNITED STATES DISTRICT COURT

9 DISTRICT OF NEVADA

10 RONALD D. DIGGS,

Case No. 2:09-cv-02339-RLH-RJJ

11 Plaintiff,

12 vs.

13 LAS VEGAS METROPOLITAN POLICE
DEPARTMENT, a political subdivision of the
14 State of Nevada; SGT. D. WALBURN,
individually; OFFICER T. ROBERTS,
15 individually, and JOHN DOES I-X, inclusive,

16 Defendants.

**DEFENDANT LAS VEGAS
METROPOLITAN POLICE
DEPARTMENT'S MOTION TO REDACT
INFORMATION IN DOCKET NO. 88-1**

(Expedited Relief Requested)

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18 Defendant LAS VEGAS METROPOLITAN POLICE DEPARTMENT ("LVMPD"), by
19 and through its attorneys of record, Kaempfer Crowell, hereby moves this Court for an Order
20 redacting Exhibit A to LVMPD's Motion for Summary Judgment, located at Docket No. 88-1

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1 pursuant to Fed.R.Civ.P. 5.2. This motion is based on the pleadings and papers on file herein
 2 and the following Memorandum of Points and Authorities.

3 DATED this 20th day of March, 2015.

4 KAEMPFER CROWELL

6 BY: /s/ Lyssa S. Anderson

LYSSA S. ANDERSON (Nevada Bar No. 5781)
 RYAN W. DANIELS (Nevada Bar No. 13094)
 8345 West Sunset Road, Suite 250
 Las Vegas, Nevada 89113
Attorneys for Defendants

10 **MEMORANDUM OF POINTS AND AUTHORITIES**

11 On February 5, 2015 LVMPD filed Defendant Las Vegas Metropolitan Police
 12 Department's Motion for Summary Judgment [Docket No. 88] with Exhibits A – BB attached.
 13 Located at Docket No. 88-1, Exhibit A, page 4 of 62, is Plaintiff's Responses to Interrogatories
 14 ("Interrogatory Responses"). LVMPD inadvertently did not redact Plaintiff's response which
 15 contained his full social security number.

16 Fed.R.Civ.P. 5.2(a)(1) provides in pertinent part: Unless the court orders otherwise, in an
 17 electronic or paper filing with the court that contains and individual's social security number ...
 18 a party or nonparty making the filing may include only: the last four digits of the social security
 19 number... As stated above, LVMPD inadvertently filed the Interrogatory Responses without
 20 redacting the social security number. The error was an oversight and not done with any
 21 deliberate intent. All other instances in which Plaintiff's social security number was listed were
 22 appropriately redacted.

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1 LVMPD apologizes to the Court and the Plaintiff and seeks to correct this error by way
2 of this instant Motion. As such, LVMPD respectfully requests an Order from this Court
3 directing the Clerk of the Court to redact Plaintiff's social security number in the Interrogatory
4 Responses.

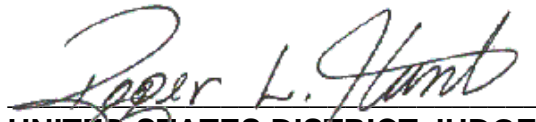
5 DATED this 20th day of March, 2015.

6 KAEMPFER CROWELL

7
8 BY: /s/ Lyssa S. Anderson

9 LYSSA S. ANDERSON (Nevada Bar No. 5781)
10 RYAN W. DANIELS (Nevada Bar No. 13094)
8345 West Sunset Road, Suite 250
Las Vegas, Nevada 89113
11 **Attorneys for Defendants**

12 **IT IS SO ORDERED.**

13 
14 **UNITED STATES DISTRICT JUDGE**

15 **DATED: March 23, 2015**

CERTIFICATE OF SERVICE

I hereby certify that on this date I electronically filed the foregoing **DEFENDANT LAS VEGAS METROPOLITAN POLICE DEPARTMENT'S MOTION TO REDACT INFORMATION IN DOCKET NO. 88-1 (Expedited Relief Requested)** using the court's CM/ECF system which will send notification to the following:

HATFIELD & ASSOCIATES
TREVOR HATFIELD
703 S. Eighth Street
Las Vegas, NV 89101
Attorney for Plaintiff

DATED this 20th day of March, 2015.

/s/ Becky Hildebrand
an employee of Kaempfer Crowell